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17  
18 **UNITED STATES DISTRICT COURT**  
19  
20 **DISTRICT OF NEVADA**

21 BRIAN BORENSTEIN, an individual,  
22  
23 Plaintiff

24 vs.

CASE No.: 2:19-CV-00985-APG-DJA

25 THE ANIMAL FOUNDATION, a domestic  
26 nonprofit corporation; COUNTY OF CLARK, *ex*  
27 *rel.* CLARK COUNTY ANIMAL CONTROL, a  
28 political subdivision of the State of Nevada;  
SUNRISE HOSPITAL AND MEDICAL  
CENTER, LLC, a foreign limited-liability  
company domiciled in Delaware; CARLY  
SCHOLTEN, an individual; VICTOR ZAVALA,  
an individual; ULRIKE PASTERNAK, an  
individual; and ROE BUSINESS ENTITIES 1-5;  
and DOE INDIVIDUALS 1-5,

Defendants.

**SECOND STIPULATION TO EXTEND  
TIME FOR BRIAN BORENSTEIN TO  
FILE A RESPONSE TO THE ANIMAL  
FOUNDATION'S MOTION TO DISMISS  
AND TO REPLY THE ANIMAL  
FOUNDATION'S OPPOSITION TO  
PLAINTIFF'S SECOND MOTION FOR  
MISCELLANEOUS RELIEF**

**(Second Request)**

Plaintiff BRIAN BORENSTEIN ("Plaintiff") and Defendant The Animal Foundation (collectively, the "PARTIES"), through their respective counsel, hereby stipulate and agree to extend the time for Brian Borenstein to respond to Defendant The Animal Foundation's Motion to

1 Dismiss (ECF No. 54), from July 31, 2020 to August 14, 2020 and to reply to Defendant The  
2 Animal Foundation's Opposition to Plaintiff's Second Motion for Miscellaneous Relief (ECF No.  
3 60), from July 31, 2020 to August 14, 2020.

4 This request is made in good faith and is not for the purpose of undue delay. Defendant's  
5 counsel has approved the form and content of this request and has authorized Plaintiff's counsel to  
6 affix her electronic signature hereto.

7 STIPULATED AND AGREED by:

8  
9 DATED 31<sup>st</sup> day of July, 2020.

DATED 31<sup>st</sup> day of July, 2020.

10 **REID RUBINSTEIN & BOGATZ**

11 By: /s/ Robert S. Melcic  
12 Robert S. Melcic, Esq.  
13 Nevada Bar No. 14923  
14 4930 Mar Vista Way  
Las Vegas, Nevada 89121

15 *Attorney for Plaintiff,*  
Brian Borenstein

By: /s/ Kerry E. Kleiman  
Kerry. E. Kleiman, Esq.  
Nevada Bar No. 3367  
300 South 4<sup>th</sup> Street, Suite 830  
Las Vegas, Nevada 89101

*Attorneys for Defendant,*  
The Animal Foundation

16  
17  
18 **ORDER**

19 IT IS SO ORDERED.

20 DATED this 3rd day of August, 2020.

21   
22 U.S. DISTRICT COURT JUDGE

23 Respectfully submitted by:

24  
25 By: /s/ Robert S. Melcic  
26 Robert S. Melcic, Esq.  
27 Nevada Bar No. 14923  
4930 Mar Vista Way  
Las Vegas, Nevada 89121

**CERTIFICATE OF E-SERVICE**

I hereby certify that I am not a party to this action and that on the 31st day of July 2020, I caused to be served a true and correct copy of foregoing **SECOND STIPULATION TO EXTEND TIME FOR BRIAN BORENSTEIN TO FILE A RESPONSE TO THE ANIMAL FOUNDATION'S MOTION TO DISMISS AND TO REPLY THE ANIMAL FOUNDATION'S OPPOSITION TO PLAINTIFF'S SECOND MOTION FOR MISCELLANEOUS RELIEF** in following manner:

(ELECTRONIC SERVICE) Pursuant to Rule 5-4 of the Local Rules of Civil Practice of the United States District Court for the District of Nevada, the above-referenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by that Court's facilities.

/s/ Robert S. Melcic  
Robert S. Melcic, Esq.